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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DPH HOLDINGS CORP., <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Reorganized Debtors.	:	(Jointly Administered)
	:	
-----X		

**SUPPLEMENTAL DECLARATION OF RICHARD M. GOLDMAN IN SUPPORT
OF REORGANIZED DEBTORS' REPLY TO OBJECTION BY GENERAL
MOTORS LLC TO REORGANIZED DEBTORS' MOTION FOR AN ORDER
TO COMPEL COMPLIANCE WITH, AND TO IMPLEMENT, THE MODIFIED
PLAN, PLAN MODIFICATION ORDER AND RELATED DOCUMENTS**

I, Richard M. Goldman, submit this declaration (this "Supplemental Declaration") under 28 U.S.C. § 1746 and state:

1. I am a member of the Bar of the State of New York and an associate with the law firm of Togut, Segal & Segal LLP, counsel to DPH Holdings Corp. ("DPH Holdings" or "DPH," and, together with certain of its affiliated reorganized debtors in the above-captioned chapter 11 cases, the "Reorganized Debtors").

2. I am in all respects competent to make this Supplemental Declaration, which I submit for all permissible purposes under the Federal Rules of

Bankruptcy Procedure, the Federal Rules of Civil Procedure and Federal Rules of Evidence in support of the Reorganized Debtors' Reply to Objection by General Motors LLC to Reorganized Debtors' Motion for an Order to Compel Compliance With, and to Implement, the Modified Plan, Plan Modification Order and Related Documents (the "Reply").¹

3. Attached hereto as Exhibit 1 is a true and correct copy of selected pages of the Supplemental Disclosure Statement [Docket No. 17031].

4. Attached hereto as Exhibit 2 is a true and correct copy of the Plan Modification Order and Modified Plan, excluding exhibits thereto [Docket No. 18707].

5. Attached hereto as Exhibit 3 is a true and correct copy of the First Adjournment Order [Docket No. 22110].

6. Attached hereto as Exhibit 4 is a true and correct copy of the Second Adjournment Order [Docket No. 22124].

7. Attached hereto as Exhibit 5 is a true and correct copy of the Third Adjournment Order [Docket No. 22156].

8. Attached hereto as Exhibit 6 is a true and correct copy of the Declaration of John D. Sheehan in Support of Modifications to Debtors' First Amended Joint Plan of Reorganization in Respect of MDA, Modified Plan, and Pure Credit Bid, dated July 29, 2009, excluding exhibits thereto.

9. Attached hereto as Exhibit 7 is a true and correct copy of the Declaration of Keith D. Stipp in Support of Modifications to Debtors' First Amended Joint Plan of Reorganization, dated July 18, 2009.

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Reply.

10. Attached hereto as Exhibit 8 is a true and correct copy of the Amendment to Exhibit 3.1.1.E to Master Disposition Agreement, dated September 6, 2009.

11. Attached hereto as Exhibit 9 is a true and correct copy of selected pages of the Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan, filed in *In re Motors Liquidation Co.*, Case No. 09-50026 (REG) (Bankr. S.D.N.Y. Dec. 8, 2010) [Docket No. 8023].

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed On: October 16, 2013
New York, New York

/s/ Richard M. Goldman
RICHARD M. GOLDMAN